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Ogletree Deakins

Evan B. Citron 212-492-2068 Evan.citron@ogletree.com OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

Attorneys at Law 599 Lexington Avenue, 17th Floor New York, NY 10022 Telephone: 212-492-2068

Telephone: 212-492-2068 Facsimile: 212-492-2501 www.ogletree.com

February 24, 2022

VIA ECF

The Honorable Lewis J. Liman United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

RE: Rivera v. Regal Entertainment Group,

Case No. 1:20-cv-523-LJL-JW

Dear Judge Liman:

We were recently retained to represent Defendant Regal Entertainment Group ("Defendant") in the above-referenced action. In accordance with Rule I.C of Your Honor's Individual Practices, we respectfully write to request an extension of Defendant's time to answer, move, or otherwise respond to the Complaint until March 28, 2022. Defendant respectfully submits this request so that it may be afforded additional time to investigate the allegations in the Complaint. This is Defendant's first request for an extension of time to respond to the Complaint. The undersigned contacted Plaintiff by telephone to inquire as to Plaintiff's position with respect to this request, but received a prompt advising that Plaintiff's voice mailbox was full. The parties' next appearance before the Court is currently unscheduled.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

Evan B. Citron

cc: All counsel of record (by ECF)